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January 22, 1990

Mr. Eric R. Johnson
U.S. Environmental Protection Agency
Region III
CERCLA Cost Recovery Section (3HW12)
841 Chestnut Building
Philadelphia, PA 19107

Re: Douglassville Disposal Site
(Berks Associates, Inc.)

Dear Mr. Johnson:

We represent Congoleum Corporation ("Congoleum") and I write in response to Peter Schaul's recent letter to Congoleum, requesting information about the above-referenced site. Congoleum received a previous section 104(e) request for information from EPA in September of 1985 and, after a review of its records, responded that it had no information or documents concerning the Berks Associates/Douglassville Disposal site. A copy of that earlier request and Congoleum's response thereto is enclosed for your information.

On May 30, 1989, Congoleum received another letter from EPA, advising the company that EPA considers it to be a potentially responsible party in connection with the Douglassville Disposal site. EPA also transmitted, along with that notice letter, documents which EPA apparently obtained from another source and which purportedly link Congoleum to the Douglassville Disposal site. Those documents suggest that Sloane-Delaware Floor Products, Sloane-Blabon Corporation and Congoleum-Nairn Inc. utilized the services of Berks Refining Company to re-refine benzine (an archaic name for a petroleum product, which is different from and should not be confused with benzene) during the period from November of 1953 through June of 1956. According to these documents, a copy of which are enclosed for your information, re-refined benzine was returned to Sloane-Delaware, Sloane-Blabon or Congoleum-Nairn in tanker trucks. The enclosed documents, which were provided

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to Congoleum by EPA, represent the only information which
Congoleum has about the Douglassville Disposal site.

If you have any questions about this matter, feel free to
call me at 988-2916.

Very truly yours,


Bonnie Allyn Barnett

HAND DELIVER

/jg

cc: Mr. Robert Rucker

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